

OLSHAN

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June 2, 2023

ATTN: THE HONORABLE JOHN MICHAEL VAZQUEZ
United States District Judge
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102
Courtroom PO 03

Re: U.S. ex rel. Simpson v. Bayer et al., No. 2:05-cv-3895 (D.N.J.) (JMV/LDW),
Request for Extension of Time

Dear Judge Vazquez:

We respectfully submit this letter pursuant to Your Honor's Judicial Preferences to request an extension of 14 days to allow Olshan Frome Wolosky LLP ("Olshan"), prior counsel to the Relator in this case, to submit a reply brief in further support of its Motion Seeking: 1) Intervention; 2) Reasonable Attorneys' Fees and Related Costs (the "Motion," ECF Nos. 414, 415). Olshan's reply brief is presently due on June 6, 2023. Olshan requests an extension up to and including June 20, 2023. The request is necessary to allow Olshan sufficient time to respond adequately to Defendants' Opposition and to submit the additional attorneys' fees and costs that have been incurred over the last six months since the original fee application was filed in the beginning of January, 2023. We have requested two weeks due, in part, to counsel's intervening vacation schedules. The requested extension will not prejudice the parties or delay the proceeding, as efforts to settlement on Olshan's part have been ongoing and will continue if granted.

The Court has granted multiple extensions of time for Defendants in connection with the pending fee applications. This is Olshan's first request for an extension of time. Counsel for

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Defendants has consented to this requested extension. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Kyle C. Bisceglie

Kyle C. Bisceglie